

# Exhibit D

1 Mark S. O'Connor (011029)  
2 BEUS GILBERT MCGRODER PLLC  
3 701 North 44<sup>th</sup> St.  
4 Phoenix, AZ 85008  
5 Telephone: (480) 429-3000  
6 moconnor@beusgilbert.com

7 Ramon Rossi Lopez (admitted *pro hac vice*)  
8 (CA Bar No. 86361)  
9 LOPEZ MCHUGH LLP  
10 100 Bayview Circle, Suite 5600  
11 Newport Beach, CA 92660  
12 rlopez@lopezmchugh.com

13 *Attorneys for Plaintiffs*

14 James R. Condo (#005867)  
15 Kristine L. Gallardo (#033975)  
16 SNELL & WILMER L.L.P.  
17 One Arizona Center  
18 400 E. Van Buren, Suite 1900  
19 Phoenix, AZ 85004-2204  
20 Telephone: (602) 382-6000  
21 jcondo@swlaw.com  
22 kgallardo@swlaw.com

23 Richard B. North, Jr. (admitted *pro hac vice*)  
24 Georgia Bar No. 545599  
25 Matthew B. Lerner (admitted *pro hac vice*)  
26 Georgia Bar No. 446986  
27 NELSON MULLINS RILEY & SCARBOROUGH LLP  
28 Atlantic Station  
201 17th Street, NW, Suite 1700  
Atlanta, GA 30363  
Telephone: (404) 322-6000  
richard.north@nelsonmullins.com  
matthew.lerner@nelsonmullins.com

*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**JOINT STIPULATION OF  
DESIGNATION OF RECORD ON  
REMAND PURSUANT TO JPML  
RULE 10.4(a)**

(Assigned to the Honorable David G.  
Campbell)

Pursuant to Rule 10.4(a) of the Rules of Procedure of the United States Judicial Panel on Multidistrict Litigation, Case Management Order No. 47 (Doc. 21540 at 4), and the agreement of all parties, Defendants C. R. Bard, Inc., and Bard Peripheral Vascular, Inc. (collectively, “Bard”), hereby submit the following designations for the record to be remanded in the cases listed on **Schedules A and B**, attached hereto:

- As required by JPML Rule 10.4(b), all entries in the individual member case dockets for the cases listed on **Schedules A and B**; and
- All documents from the Master MDL case file (No. 15-MD-02641) that are listed in **Exhibit “A”**, attached hereto.

The parties reserve the right to challenge the relevance of any document or filing, in whole or in part, or any ruling designated herein upon remand. By entering this stipulation, the parties are not conceding that any ruling binds the parties on the merits or is the law of the case on remand. Further, while the parties were diligent in reviewing the docket and making these designations, the parties reserve the right to present to the transferor court any documents or filings that were inadvertently excluded from this designation.

RESPECTFULLY SUBMITTED this 6th day of August, 2020.

BEUS GILBERT MCGRODER PLLC

NELSON MULLINS RILEY &  
SCARBOROUGH, LLP

By: /s/ Mark O'Connor (with permission)  
Mark S. O'Connor (011029)  
701 North 44<sup>th</sup> St.  
Phoenix, AZ 85008

By: /s/ Richard B. North, Jr.  
Richard B. North, Jr. (*pro hac vice*)  
Georgia Bar No. 545599  
Matthew B. Lerner (*pro hac vice*)  
Georgia Bar No. 446986  
Atlantic Station  
201 17th Street, NW / Suite 1700  
Atlanta, GA 30363

1 Ramon Rossi Lopez  
2 (admitted *pro hac vice*)  
3 CA Bar No. 86361  
4 LOPEZ MCHUGH LLP  
5 100 Bayview Circle, Suite 5600  
6 Newport Beach, CA 92660

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Co-Lead/Liaison Counsel for  
Plaintiffs*

James R. Condo (005867)  
Kristine L. Gallardo (033975)  
SNELL & WILMER L.L.P.  
One Arizona Center  
400 E. Van Buren  
Phoenix, AZ 85004-2204

*Attorneys for C. R. Bard, Inc. and Bard  
Peripheral Vascular, Inc.*